



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS
F. #2015R01787

*271 Cadman Plaza East
Brooklyn, New York 11201*

November 14, 2018

By Hand and ECF

The Honorable Dora L. Irizarry
Chief United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Dan Zhong
Criminal Docket No. 16-614 (DLI)

Dear Chief Judge Irizarry:

The government respectfully submits this application to exclude time from speedy trial computation under 18 U.S.C. § 3161, from November 13, 2018 until November 28, 2018—the date of the next scheduled status conference. The government respectfully submits that exclusion is appropriate, in light of the pending defense motion to compel discovery, see 18 U.S.C. § 3161(h)(1)(D), and in light of the prior designation of this case as complex, see 18 U.S.C. § 3161(h)(7)(B)(ii).

The government has consulted with counsel the defendant, who has no objection to this request.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Alexander A. Solomon
Alexander A. Solomon
Douglas M. Pravda
Ian C. Richardson
Nicholas J. Moscow
Assistant U.S. Attorneys
(718) 254-7000

cc: Clerk of Court (DLI) (by ECF)
Defense counsel (by ECF)